<u>TMDL Implementation Plan for</u> West Point Lake: Troup and Heard Counties <u>Fish Consumption Guideline</u>

Overview

The "Guidelines for Eating Fish from Georgia Waters - 2000 Update" (the "Year 2000 Fish Consumption Guidelines"), contains a fish consumption guideline for Channel Catfish over 12" long and Carp over 16" long, that are caught in West Point Lake. The Year 2000 Fish Consumption Guidelines recommend that a person have no more than one meal per week consisting of such fish, because of polychlorinated bipenyls (PCBs) levels found in the tissue of those fish.

The Year 2000 Fish Consumption Guidelines show that no similar fish consumption guideline is appropriate for Channel Catfish under 12", Carp under 16", Largemouth Bass over 16" (it is illegal to keep Largemouth Bass caught that are under 16"), Hybrid Bass, and Black Crappie.

The Georgia Department of Natural Resources has one of the most progressive fish testing programs in the Southeast. A variety of different fish species were tested for 43 different contaminants, including metals, organic chemicals, and pesticides (including chlordane, DDT, and dieldrin, among others).

Contaminants can get into fish in a variety of ways. Fish absorb PCBs from water, suspended sediments, or their food. These chemicals concentrate in the fat of fish tissue and in fatty fish such as carp and catfish. Cleaning and cooking a fish as recommended in the Year 2000 Fish Consumption Guidelines will lower the amount of PCBs in a fish meal.

Fich consumption guidelines are not required by EPA. They are based on a conservative approach developed by Georgia EPD

toxicologists. Under that approach, the guideline is first based on an assumption that a person might eat a type of fish with the highest measured PCB levels, continuously for 30 years. It is unlikely that someone would actually do that. Even if someone did that, if the person followed the guideline given in the Year 2000 Fish Consumption Guidelines, the person would have a risk of less than 0.01% (1 X 10⁻⁵) of developing cancer that could be caused by that fish consumption. This represents a level safer than the level allowed by the U.S. Food and Drug Administration, for PCBs in fish tissue. Thus, it is a level safer than PCBs that could be present in a fish eaten in a restaurant in interstate commerce.

Point Source Elements

There are no known point sources of PCBs that are causing PCBs in fish tissue in this water body. PCBs have been banned for use in manufacturing by EPA under the toxic Substances Control Act. They are also banned from use in manufacturing, under Georgia law [Cite.] Consequently, the implementation plan only addresses Nonpoint Source Elements, below.

Nonpoint Source Elements

(1) The source category of the nonpoint source(s) causing this fish consumption guideline is former manufacturing plants that used PCBs in the manufacturing process and had PCBs in their wastewater.